

November 7, 2016

## **VIA ECFS**

Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re: Wiregrass Telecom, Inc. Challenge to CenturyLink's Connect America Fund Phase I, Round 2 Notice of Incremental Support Election WC Docket No. 10-90

Dear Ms. Dortch,

Pursuant to the Wireline Competition Bureau's ("WCB") September 23, 2016 Public Notice<sup>1</sup>, Wiregrass Telecom, Inc. ("Wiregrass" or the "Company") hereby provides notice to CenturyLink and the WCB that 17 census blocks for which CenturyLink seeks incremental Connect America Fund ("CAF") Phase I, Round 2 support are already served by Wiregrass with 3 Mbps download, 768 kbps upload or greater. In order to avoid providing support to providers to serve census blocks that already have service by a competitive provider, the Federal Communications Commission ("FCC") created a challenge process that has been used effectively in many proceedings. Competitive providers are now to challenge CenturyLink's proposal to claim CAF support in census blocks that are actually served by a competitor. Wiregrass is a competitive provider that already serves census blocks where CenturyLink seeks CAF support.

Wiregrass has reported that the census blocks listed in Appendix A are served on the Company's Form 477 filings. Wiregrass's Form 477 filings are certified by an officer and serve as evidence that the Company provides broadband service to these census blocks at speeds greater than 3 Mbps/768 kbps. Therefore, CenturyLink's request to use CAF Phase I, Round 2 support to extend service to the blocks listed below should be denied.

Wiregrass is providing this letter to CenturyLink, which serves as notice that the Company already provides service in the census blocks in question, and therefore CenturyLink will not be able to certify that the locations in the census blocks listed in Appendix A are unserved to the best of its knowledge.

<sup>&</sup>lt;sup>1</sup> Wireline Competition Bureau Announces Deadline for Existing Providers to Notify CenturyLink that They Serve Census Blocks that CenturyLink Proposes to Serve with Connect America Phase I Incremental Support, Public Notice, WC Docket No. 10-90, DA 16-1072 (rel. Sept. 23, 2016) ("Public Notice").

I hereby certify that the above statements are true to the best of my knowledge, and the Company submitted and certified a Form 477 report that reflects its broadband service in the census blocks listed in Attachment A.

Respectfully submitted,

Arlene Morgan, Director of Regulatory

WOW, Inc. parent company of

Wiregrass Telecom, Inc.

Enclosure

cc: Heidi Lankau, Wireline Competition Bureau

Jeffrey Lanning, Vice President Federal Regulatory Affairs, CenturyLink

## APPENDIX A

## CENSUS BLOCKS ALREADY SERVED BY WIREGRASS TELECOM, INC.

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## **CERTIFICATE OF SERVICE**

I, Cassandra Heyne, hereby certify that a true and correct copy of the foregoing Notice of Wiregrass Telecom was served on this 7<sup>th</sup> day of November, 2016, via courier, to CenturyLink's representatives, as follows:

Jeffrey Lanning Vice President – Federal Regulatory Affairs 1099 New York Avenue NW Suite 250 Washington, DC 20001

/s/ Cassandra Heyne
Cassandra Heyne, Consultant
JSI
Authorized Representative for Wiregrass Telecom, Inc.